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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:

Docket No.: 2038155-5001US

Christopher K. Williams, et al.

Serial No.: 09/648,877

Group Art Unit: 3692

Confirmation No.: 7537

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Examiner: POINVIL, Frantzy

For: THIRD-PARTY BILLING SYSTEM AND METHOD

Mail Stop: ISSUE FEE Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Sir:

Applicant appreciates the indication in the Notice of Allowance mailed July 2, 2007 that claims 21, 22, 58, 60, 68-72, 75, 77 and 80 are allowed. While Applicant agrees these claims are patentable over the cited references, Applicant does not agree that patentability resides in each feature exactly as expressed in the claims, nor that each feature is required for patentability of each claim.

Respectfully submitted

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Date: September 18, 2007

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